

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

BRYCE KELLY BARFIELD,

DEBTOR.

**Case No.: BK-14-12943-NLJ
Chapter 13**

RESPONSE TO OBJECTION TO CLAIM BY TRUSTEE

Comes now the secured creditor, BENEFICIAL FINANCIAL I INC., by their attorney, Robert J. Hauge, and responds to Objection to Claim Number 3 filed by the Trustee on October 21, 2014:

1. BENEFICIAL FINANCIAL I INC. is the holder of a purchase money note and mortgage on the Debtor's real property (the "Property"). The note has an outstanding balance of \$95,092.26 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The Proof of Claim was filed on October 3, 2014, prior to the claims bar date of November 19, 2014. The Plan was confirmed on September 4, 2014. The debtor should be required to modify their Plan to provide for the arrearage portion of the claim.

3. This response is to protect Creditor's rights regarding its proof of claim and Creditor reserves the right to supplement this response. Counsel for BENEFICIAL FINANCIAL I INC. is currently researching the items raised in the Objection.

WHEREFORE, PREMISES CONSIDERED, BENEFICIAL FINANCIAL I INC. prays this Court deny the Objection; and for such further relief as this Court deems appropriate.

BENEFICIAL FINANCIAL I INC.,

By: s/ Robert J. Hauge
Robert J. Hauge - #20007
Baer, Timberlake, Coulson & Cates, P.C.
6846 South Canton, Suite 100
Tulsa, Oklahoma 74136
Telephone: (918) 491-3100
Facsimile: (918) 491-5424
Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Response with postage thereon fully prepaid to the parties listed below on November 12, 2014.

Bryce Kelly Barfield
P.O. Box 3762
Shawnee, OK 74802

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

James E. Palinkas
318 N. Broadway
Shawnee, OK 74801

By: s/ Robert J. Hauge
Robert J. Hauge